Annual 47 C.F.R. 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2017

Date Filed: February 8, 2018

Name of company covered by this certification: VDL Inc. d/b/a Global Telecom Brokers

Form 499 Filer ID: 817790

Name of signatory: Paul Meek

Title of signatory: Vice President

I, Paul Meek, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and subject it to enforcement action.

Signed _

Description of CPNI Policies and Procedures

VDL Inc. d/b/a Global Telecom Brokers has established procedures that are adequate to ensure compliance with the CPNI rules currently in effect. The company does not use CPNI for marketing purposes, including selling, renting, or otherwise disclosing customers' CPNI to other entities. Additionally, the company has implemented a number of safeguards related to CPNI, including training of company personnel and documentation of CPNI policies in company procedures.